

Ronald J. Schutz (*Pro Hac Vice* pending), RJSchutz@rkmc.com
Richard M. Martinez (*Pro Hac Vice*), RMMartinez@rkmc.com
Sang Young A. Brodie (*Pro Hac Vice*), SYBrodie@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
800 LaSalle Avenue, 2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: (612) 349-8500
Facsimile: (612) 339-4181

** E-filed July 29, 2010 **

David Martinez, (CA Bar No. 193183), DMartinez@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: (310) 552-0130
Facsimile: (310) 229-5800

Attnorneys for Plaintiff,
TV INTERACTIVE DATA CORPORATION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TV INTERACTIVE DATA CORPORATION, a
California Corporation,

Plaintiff,

V.

SONY CORPORATION; SONY COMPUTER ENTERTAINMENT INC.; SONY COMPUTER ENTERTAINMENT AMERICA, INC.; SONY CORPORATION OF AMERICA; SONY ELECTRONICS, INC.; SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA, INC.; ROYAL PHILIPS ELECTRONICS N.V.; PHILIPS ELECTRONICS NORTH AMERICA CORPORATION; TOSHIBA CORPORATION; TOSHIBA AMERICA, INC.; TOSHIBA AMERICA CONSUMER PRODUCTS, L.L.C.; PANASONIC CORPORATION; PANASONIC CORPORATION OF NORTH AMERICA; VICTOR COMPANY OF JAPAN, LTD.; JVC AMERICAS CORP.; LG ELECTRONICS, INC.; LG ELECTRONICS U.S.A., INC.; ZENITH ELECTRONICS LLC; PIONEER CORPORATION; PIONEER ELECTRONICS (USA) INC.; SHARP CORPORATION; SHARP ELECTRONICS CORPORATION; FUNAI ELECTRIC CO., LTD.; FUNAI CORPORATION, INC.; D&M HOLDINGS INC.; D&M HOLDINGS US, INC.; DENON ELECTRONICS (USA), LLC,

Defendants.

Case No. 10-00475 JF/HL

**STIPULATION AND
[PROPOSED] ORDER
REGARDING EXPERT
DISCOVERY**

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 The parties hereby agree and stipulate as follows, subject to approval by this Court:

2 1. Expert-related written discovery in the above-captioned action shall be limited to
3 the final expert reports, as well as any and all documents, materials, and/or other information the
4 experts reviewed in reaching their opinions (whether affirmative or rebuttal opinions), except as
5 otherwise provided in this stipulation.

6 2. The following shall be produced on the date expert disclosures are due: (a) expert
7 reports, (b) any documents, materials and/or other information the experts reviewed in reaching
8 their opinions, except as otherwise provided in this stipulation. To the extent any such
9 documents, materials, and/or other information already has been produced in the litigation, the
10 producing party may instead produce a schedule listing such documents and information by Bates
11 number and any other information sufficient to identify the document and its location.

12 3. The parties and experts need not retain, produce or testify about drafts of the
13 required expert reports (or related demonstratives and exhibits), other work product prepared by
14 or for the experts or their staff, or notes, emails or other communications made in connection with
15 the drafting of the reports.

16 AGREED and STIPULATED

17 I David Martinez, the filer of this document, attest that concurrence in the filing of this
18 document has been obtained from each of the other signatories below.

19
20
21
22
23
24
25
26
27
28

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

2 By: /s/David Martinez
3 Ronald J. Schutz (*Pro Hac Vice* pending)
4 Richard M. Martinez (*Pro Hac Vice*)
5 Sang Young A. Brodie (*Pro Hac Vice*)
6 **ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**
7 800 LaSalle Avenue, 2800 LaSalle Plaza
8 Minneapolis, MN 55402
9 Telephone: (612) 349-8500
10 Facsimile: (612) 339-4181

11 David Martinez, (CA Bar No. 193183)
12 **ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**
13 2049 Century Park East, Suite 3400
14 Los Angeles, CA 90067-3208
15 Telephone: (310) 552-0130
16 Facsimile: (310) 229-5800

17 **ATTORNEYS FOR PLAINTIFF**
18 **TV INTERACTIVE DATA CORPORATION**

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010

2
3
4
5
6
7
MORRISON & FOERSTER LLP

8 By: /s/Rick S. Ballinger
9 Karl J. Kramer
10 Rick S. Ballinger
11 **MORRISON & FOERSTER LLP**
12 755 Page Mill Road
13 Palo Alto, CA 94304
14 Telephone: (650) 813-5775
15 Facsimile: (650) 494-0792

16 Jack W. Londen
17 **MORRISON & FOERSTER LLP**
18 Shin-Marunouchi 1-Chome
19 Tokyo, Chiuoda-ku 100-6529, Japan
20 Telephone: +81-3-3214-6522

21
22
23
24
25
26
27
28
**ATTORNEYS FOR DEFENDANTS D&M
HOLDINGS INC.; D&M HOLDINGS US,
INC.; AND DENON ELECTRONICS (USA),
LLC**

DATED: July 23, 2010

BAKER & HOSTETLER, LLP

By: /s/Kevin W. Kirsch
Kevin W. Kirsch
John F. Bennett
Matthew P. Hayden
David A. Mancino
BAKER & HOSTETLER, LLP
312 Walnut Street, Suite 3200
Cincinnati, OH 45202
Telephone: (513) 929-3499
Facsimile: (513) 929-0303

Hayes F. Michel
BAKER & HOSTETLER, LLP
12100 Wilshire Blvd.
Los Angeles, CA 90025
Telephone: (310) 979-8460
Facsimile: (310) 820-8859

**ATTORNEYS FOR DEFENDANTS FUNAI
ELECTRONIC CO. LTD. AND FUNAI
CORPORATION, INC.**

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010
2

3 **ROTHWELL, FIGG, ERNST & MANBECK**
4

5 By: /s/Brian A. Tollfeson
6 Steve Lieberman
7 Joo Mee Kim
8 Brian A. Tollefson
9

10 **ROTHWELL, FIGG, ERNST & MANBECK**
11 1425 K Street/Suite 800
12 Washington, DC 20005
13 Telephone: (202) 783-6040
14 Facsimile: (202) 783-6031
15

16 Clement L. Glynn
17 Lucas V. Munoz
18 **GLYNN & FINLEY**
19 One Walnut Creek Center
20 100 Pringle Ave./Suite 500
21 Walnut Creek, CA 94596
22 Telephone: (925) 210-2801
23 Facsimile: (925) 945-1975
24

25 **ATTORNEYS FOR DEFENDANTS LG**
26 **ELECTRONICS, INC.; LG ELECTRONICS**
27 **U.S.A., INC.; AND ZENITH ELECTRONICS**
28 **LLC**

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
Los Angeles

1 DATED: July 23, 2010

2
3
4
5
6
7
HOWREY LLP

8 By: /s/Jason T. Anderson
9 Jason T. Anderson
10 Christina Finn
11
HOWREY LLP
12 1950 University Ave./4th Floor
13 East Palo Alto, CA 94303
14 Telephone: (650) 798-3544
15 Facsimile: (650) 429-2096

16 Alan Grimaldi
17 Brian Rosenthal
18
HOWREY LLP
19 1299 Pennsylvania Ave., N.W.
20 Washington, DC 20004
21 Telephone: (202) 383-6989
22 Facsimile: (202) 383-6610

23
24
25
26
27
28
ATTORNEYS FOR DEFENDANTS ROYAL
PHILIPS ELECTRONICS N.V. AND PHILIPS
ELECTRONICS NORTH AMERICA
CORPORATION

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010

2
3
4
5
6
7
MORRISON & FOERSTER LLP

8 By: /s/Sherman W. Kahn
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Karen Hagberg
Sherman W. Kahn
Hui Liu

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, NY 10104
Telephone: (212) 468-8032
Facsimile: (212) 468-7900

**ATTORNEYS FOR DEFENDANTS PIONEER
CORPORATION AND PIONEER
ELECTRONICS (USA) INC.**

12 DATED: July 23, 2010

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
MORRISON & FOERSTER LLP

By: /s/Sherman W. Kahn
Karen Hagberg
Sherman W. Kahn
Hui Liu

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, NY 10104
Telephone: (212) 468-8032
Facsimile: (212) 468-7900

**ATTORNEYS FOR DEFENDANTS SHARP
CORPORATION AND SHARP
ELECTRONICS CORPORATION**

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010
2

COVINGTON & BURLING LLP

3 By: /s/Nathan E. Shafrroth
4 Nathan E. Shafrroth

COVINGTON & BURLING LLP
5 One Front Street
San Francisco, CA 94111
Telephone: (415) 591-7053
Facsimile: (415) 955-6503

6
7 Richard L. Rainey
8 **COVINGTON & BURLING LLP**
1201 Pennsylvania Avenue N.W.
Washington, DC 20004
Telephone: (202) 662-5441

9
10 Robert T. Haslam
11 **COVINGTON & BURLING LLP**
333 Twin Dolphin Drive
Redwood Shores, CA 94062
Telephone: (650) 632-4702

12
13 **ATTORNEYS FOR DEFENDANTS**
14 **SAMSUNG ELECTRONICS CO., LTD. AND**
SAMSUNG ELECTRONICS AMERICA, INC.

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

DATED: July 23, 2010

**LERNER, DAVID, LITTBENBERG,
KRIMHOLZ & MENTLIK, L.L.P.**

By: /s/Jonathan A. David

Gregory S. Gewirtz

Jonathan A. David

Bryan J. Sommese

**LERNER, DAVID, LITTBENBERG,
KRIMHOLZ & MENTLIK, L.L.P.**

600 South Avenue West

Westfield, NJ 07090

Telephone: (612) 349-8500

Facsimile: (612) 339-4181

Duane M. Geck

Philip Barilovits

SEVERSON & WERSON

One Embarcadero Center, Suite 2600

San Francisco, CA 94111

Telephone: (415) 677-5501

Facsimile: (415) 596-0439

**ATTORNEYS FOR DEFENDANTS SONY
COMPUTER ENTERTAINMENT AMERICA
LLC; SONY CORPORATION OF AMERICA;
SONY ELECTRONICS, INC.; SONY
CORPORATION; AND SONY COMPUTER
ENTERTAINMENT INC.**

DATED: July 23, 2010

DLA PIPER LLP

By: /s/Ronald L. Yin

Ronald L. Yin

Mark D. Fowler

Gerald T. Sekimura

Sal Lim

Erik R. Fuehrer

DLA PIPER LLP

2000 University Ave.

East Palo Alto, CA 94303

Telephone: (650) 833-2437

Facsimile: (650) 687-1208

**ATTORNEYS FOR DEFENDANTS TOSHIBA
CORPORATION; TOSHIBA AMERICA, INC.;
AND TOSHIBA AMERICA CONSUMER
PRODUCTS, L.L.C.**

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: July 23, 2010
2

ORRICK, HERRINGTON & SUTCLIFFE LLP

3 By: /s/Trevor C. Hill
4 Steven J. Routh
5 Sten A. Jensen
6 Trevor C. Hill
7 T. Vann Pearce, Jr.

ORRICK, HERRINGTON & SUTCLIFFE LLP

1152 15th Street, NW
Washington, DC 20005
Telephone: (202) 339-8696
Facsimile: (202) 339-8500

8 William H. Wright
9

ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa St., Suite 3200
Los Angeles, CA 90017
Telephone: (213) 612-2478

10
11 **ATTORNEYS FOR DEFENDANTS VICTOR**
12 **COMPANY OF JAPAN, LTD. AND JVC**
13 **AMERICAS CORP.**
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3
4

DATED: July 29, 2010

Honorable Howard R. Lloyd
United States Magistrate Judge

ROBINS, KAPLAN, MILLER & CIRSEI L.L.P.
ATTORNEYS AT LAW
Los Angeles

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)
) ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2049 Century Park East, Suite 3400, Los Angeles, California 90067-3208.

On July 23, 2010, I served the foregoing document described as **STIPULATION AND [PROPOSED] ORDER REGARDING EXPERT DISCOVERY** on the interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

Richard L. Rainey, Esq.
COVINGTON & BURLING LLP
1201 Pennsylvania Ave., NW
Washington, D.C. 20004-2401
Phone: (202) 662-6000
Fax:(202) 662-6291
E-Mail: rrainey@cov.com

Attorneys for Defendants
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

Brian A. Tollefson, Esq.
ROTHWELL, FIGG, ERNST &
MANBECK, P.C.
1425 K Street, N.W. Suite 800
Washington, DC 20005
Phone: (202) 783-6040
Fax: (202) 783-6031
E-Mail: btollefson@rfem.com

Attorneys for Defendants
Zenith Electronics LLC and LG
Electronics U.S.A., Inc.

Sten A. Jensen, Esq.
Steven J. Routh, Esq.
ORRICK, HERRINGTON &
SUTCLIFFE LLP
1152 15th Street, N.W.
Washington, DC 20005-1706
Phone: (202) 339-8400
Fax: (202) 339-8500
E-Mail: sjensen@orrick.com,
srouth@orrick.com

Attorneys for Defendant
JVC Americas Corp.

Alan Grimaldi, Esq.
HOWREY LLP
1299 Pennsylvania Ave., NW
Washington, DC 20004-2402
Phone: (202) 783-0800
Fax: (202) 383-6610
E-Mail: grimaldia@howrey.com

Attorneys for Defendants
Philips Electronic North America
Corporation and Royal Philips
Electronics N.V.

1 [X] **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles,
2 California. The envelope was mailed with postage thereon fully prepaid.

3 I am "readily familiar" with this firm's practice of collection and processing
4 correspondence for mailing. It is deposited with U.S. postal service on that same day in
5 the ordinary course of business. I am aware that on motion of party served, service is
6 presumed invalid if postal cancellation date or postage meter date is more than one day
7 after date of deposit for mailing in affidavit.

8 [I] **BY FEDERAL EXPRESS - OVERNIGHT:** I caused such envelope to be deposited in
9 a box or other facility regularly maintained by Federal Express in an envelope or package
designated by Federal Express with delivery fees paid.

8 [I] **BY ELECTRONIC MEANS:** I served a true copy of the document(s) described on all
9 parties to this action by electronic means.

10 [X] (Federal) I declare that I am employed in the office of a member of the bar of this court at
11 whose direction service was made.

12 Executed on July 23, 2010 at Los Angeles, California.

13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 _____
25 _____
26 _____
27 _____
28 _____

13 /s/ Lilia Duarte
14 Lilia Duarte